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## ALTERNATIVES

### INTRODUCTION

The California Environmental Quality Act Guidelines (CEQA Guidelines, 1970, as amended, Section 15126.6) require an EIR to include a discussion of a reasonable range of alternatives to the proposed project. The CEQA Guidelines also require that the EIR explain why specific project alternatives considered at one time were rejected in favor of the proposed project. The selection of alternatives is to be guided by the provision of reasonable choices and the promotion of informed decision making and informed public participation. An EIR need not evaluate alternatives that would have effects that cannot be determined, or for which implementation would be remote and speculative.

The Guidelines also require that the EIR specifically evaluate a “no project” alternative within this discussion and that an “environmentally superior” alternative be identified (Section 15126.6 [e]).

The alternatives addressed in this EIR were selected based on the following factors:

1. The extent to which the alternative would accomplish most of the basic project objectives.
2. The extent to which the alternative would avoid or lessen any of the identified significant environmental effects of the project (discussed in Chapters 4 through 15).
3. The potential feasibility of the alternative (as discussed in this Chapter).
4. The extent to which the alternative contributes to a “reasonable range” of alternatives necessary to permit a reasoned choice.

The proposed Project is fully described in Chapter 3 of this EIR (Project Description). The environmental consequences are addressed in Chapters 4 through 19 of this EIR.

### PROJECT OBJECTIVES

CEQA requires the analysis of alternatives that would feasibly attain “most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.”<sup>1</sup> Therefore, the stated objectives can be used as a metric against which an alternative can be measured when determining overall feasibility.<sup>2</sup> Additionally, CEQA requires the evaluation of a proposed project to address only impacts to the physical environment; economic and social effects can be analyzed only as one link in a chain of cause and effect from a proposed decision (e.g., physical

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<sup>1</sup> *CEQA Guidelines*, Section 15126.6 (a)

<sup>2</sup> *Ibid.*, Section 15126.6 (a)

changes caused, in turn, by economic and social changes).<sup>3</sup> However, economic viability can be considered when determining the feasibility of a project alternative.<sup>4</sup>

The following are the objectives that would be fulfilled by the proposed Project. Alternatives are evaluated in part based on their ability to meet these objectives.

1. Maximize single-family housing opportunities in an area the Town has studied and identified for housing.
2. Reduce wildfire risk at the site, increase access for fighting wildfires, and contribute to a more fire resilient community.
3. Include sufficient affordable housing to make progress toward the Town's fair share of low-income housing needs under the Housing Element of the Town's General Plan, enable a density bonus, and comply with the Town's inclusionary housing ordinance.
4. Cluster development closest to existing infrastructure on relatively flat land, in a manner that avoids development of unstable ground, preserves substantial open space, minimizes grading, and fosters a sense of community.

## PROJECT IMPACTS

Based on the analysis contained in this EIR, implementation of the Project would not result in any impacts that would remain significant and unavoidable after the implementation of identified mitigation.

The Project would result in potentially significant impacts that would be reduced to less than significant levels with the implementation of mitigation measures recommended in this document associated with the following topics.

- Air Quality
- Biological Resources
- Cultural and Tribal Cultural Resources
- Geology and Soils
- Hydrology and Water Quality
- Wildfire

All other topic areas would have no impact or less than significant impacts only, with no mitigation warranted.

A comparison of the alternatives with respect to all the topic areas listed above is included in Table 20.1 at the end of this chapter.

## ALTERNATIVES ANALYSIS

The alternatives analysis is presented as a comparative analysis to the proposed Project. A project may have the potential to generate significant impacts, but changes to certain features may also afford the opportunity to avoid or reduce such impacts. The following alternatives analysis compares the

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<sup>3</sup> *CEQA Guidelines*, Section 15131.

<sup>4</sup> *Ibid.*, Section 15126.6(f)(1).

potential significant environmental impacts of the alternatives with those of the proposed Project for each of the environmental topics analyzed in detail in Chapters 4 through 19 of the EIR and discusses feasibility of implementation, and ability to meet objectives.

## SELECTION OF ALTERNATIVES

Three alternatives to the Project are evaluated in this chapter. Each of the alternatives is located on the Project site.

- A. No Project
- B. Larger Setback (from Nearby Lots)
- C. No Clustering

These alternatives are described in more detail in the following analysis.

As detailed in the previous chapters of this EIR, no significant and unavoidable impacts of the proposed Project were identified. In addition to the “no project” alternative required under CEQA, alternatives were selected based on known neighborhood concerns related to increased setbacks from lots to the north (“Larger Setback” Alternative) and development that could be allowed with no Planned Unit Development, which would mean no clustering (“No Clustering” Alternative).

### Alternatives Rejected From Further Consideration

Section 15126.6(c) of the CEQA Guidelines requires an EIR to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination.

#### *Off-Site Alternative*

An off-site alternative would be an alternative that places the proposed development at a different site instead of at the proposed site. The current proposal is specific to the Project site and consistent with zoning for the site and the Town’s Housing Element (see Chapter 13: Land Use). While the applicant may own other sites suitable for residential development, the development of one site does not preclude them from proposing development on any other sites. Therefore, because residential development is not unique such that consideration of residential development on a different site would mean it was no longer considered at this site, an off-site alternative was determined not to provide a useful discussion for this analysis. Also, not developing this site which is identified in the Town’s Housing Element for residential housing (and affordable housing) could affect the Town’s ability to meet its share of the Regional Housing Need, and could lead to the Town being non-compliant regarding state housing law. Further, Stanford owns the site across the street from this site, but that site is substantially smaller than the existing site and would therefore would not accommodate the Project. For these reasons, an off-site alternative was rejected from further consideration.

#### *Increased Unit Count Alternative*

The Town of Portola Valley Housing Element contains a section on Affiliated Development, including on sites owned by Stanford University, as follows:

- 2472d Portola Valley is a rural community with a history of single family development on large lots. To accommodate some multifamily development, however, the town developed a housing program in the early 1990s that would allow multifamily housing on institutional

sites for employees and staff affiliated with the institutions that own the parcels. This program allows affiliated affordable multifamily housing on three designated sites in town, each with a planned development permit.

- 2472e The Stanford Wedge is an 89 acre site owned by Stanford University, which was discussed above as one of the large parcels of land remaining in town that could be developed with housing. The town's regulations would allow 27.625 single family dwelling units on the parcel overall, and Section 2106e of the General Plan allows this density to increase by a factor of three for Portola Valley General Plan Housing Element, Adopted January 14, 2015 66 multifamily affordable housing, as long as the overall floor area does not exceed the amount allowed for market rate development. Therefore, up to 82.9 units could potentially be provided on this site, although the number would likely be lower.

As noted in the Town's Housing Element, it could potentially be possible to develop up to 82.9 units for multi-family housing on the Project site. This General Plan provision requires the construction of affordable units and deed restricting all of the 82.9 units as affordable would not meet the Project objective of providing faculty housing near Stanford University. While meeting general objectives to provide housing and multi-family housing, the increased unit count would have the same or increased environmental impacts than the proposed Project. Because it would not have the potential to result in reduced environmental impacts, it was determined that assessment of such an increased unit count as an alternative to the Project would not meaningfully contribute to the analysis in this EIR and this alternative was therefore rejected from further consideration.

#### *Reduced Unit Count Alternative*

As detailed in the previous chapters, the Project would not result in significant impacts dependent on the number of units (such as transportation impacts or operational emissions). The level of the construction-related impacts depends mostly on the area of the site to be disturbed and amount of grading. Because the proposed Project is already clustered on the generally flat portion of the site, the un-developed portion of the site would be subject to vegetation management disturbances to manage wildfire risk, and the unit count is not necessarily tied to site disturbance as larger lots could be allowed, a reduction in unit count would not be tied to a reduction in construction-related impacts. Additionally, a reduced unit count would reduce the Town's ability to meet its share of the Regional Housing Need. Alternatives B and C will present discussion of development of a different or additional portion of the site. Therefore, because a reduced unit count would not be tied to a reduction in significant impacts, such an alternative was determined not to meaningfully contribute to the analysis in this EIR and a reduced unit count alternative was rejected from further consideration.

#### *Larger Setbacks between Buildings*

The National Fire Protection Association (NFPA) is a global self-funded nonprofit organization, with a stated purpose to eliminating death, injury, property and economic loss due to fire, electrical and related hazards. While not a regulation or requirement for Project's in Portola Valley, NFPA issues codes and standards that can be used by those establishing criteria for building, processing, design, service, and installation around the world. One of these standards (1140), recommends a 30 foot separation between buildings and an alternative conforming to this informational standard was considered.

As discussed in Chapter 18: Wildfire and Appendix H, the Project as proposed would result in a reduction of wildfire hazard and risk at the site and would implement additional measures to further reduce the potential for ignitions due to human activity. Because the clustering of development along Alpine Road with surrounding defensible space separating the development from wooded slopes is

identified as a component contributing to reduced wildfire risk at this site, consideration of an expanded development with larger spaces between units would a) result in a larger development footprint closer to wooded slopes; b) not serve to substantially reduce potential wildfire impacts; and c) not achieve project objectives. Therefore, an alternative with larger setbacks between buildings was rejected from further consideration.

#### *Other Alternatives Considerations*

Obviously, not every possible alternative to the Project can be fully evaluated. Alternatives A through C satisfy the requirement to consider and discuss “a range of reasonable alternatives to the project” pursuant to CEQA Guidelines section 15126.6. As discussed in this chapter, these alternatives were chosen as reasonable alternatives at this site and no additional alternatives were identified that would substantially contribute to a meaningful evaluation, analysis, and comparison of the Project to possible alternatives.

## **ALTERNATIVE A: “NO PROJECT” ALTERNATIVE**

### Alternative Description

Alternative A is a “no project” alternative. It assumes the proposed Project is not approved and the existing Alpine Rock Ranch horse boarding facility use (or a similar use) remains in operation on the site. The Town currently has limited regulatory authority to require comprehensive vegetation management activities or construction of the fire road with no project, so this alternative assumed no change in the site conditions related to wildfire.

This alternative satisfies the CEQA requirement to evaluate a “No Project” alternative, which means “the existing conditions, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” (CEQA Guidelines, Section 15126.6[e][2]). While the Guidelines allow the no project alternative to assess development under the continuation of the existing plan, policy, or operation into the future, the site is currently partially developed with a horse boarding facility, and while it is possible that plans to intensify the existing development on the site may be proposed at some future point, there is no reason to believe this would happen in the near-term. Therefore, Alternative A presumes the site would remain largely in its current state.

### Impact Summary

Under the “No Project” Alternative, the Project site would remain as it is today with no substantial construction activities or changes to operations at the site. Therefore, the potential for all of the less than significant impacts and need for mitigation would be avoided.

While continuance of existing conditions would not be considered an impact under CEQA, the “No Project” Alternative also would not develop the site for the residential uses identified for the site in the Town’s Housing Element, would not develop additional public trails, and would not reduce wildfire risk at the site through a comprehensive vegetation management plan and fire access road as proposed under the Project.

### *Aesthetics*

The “No Project” Alternative represents no substantial change to the site and therefore no potential for aesthetics impacts.

### *Agricultural, Forestry, and Mineral Resources*

There are no agricultural, forestry, or mineral resources or regulations at the Project site and therefore no potential for impact. The proposed Project and all alternatives would have no impact with respect to these topics.

### *Air Quality and Greenhouse Gas Emissions*

The “No Project” Alternative represents no substantial construction activities or changes to operations at the site and therefore no potential for air quality and greenhouse gas emissions impacts.

### *Biological Resources*

The “No Project” Alternative represents no substantial construction activities or changes to operations at the site and therefore no potential for biological resources impacts.

### *Cultural and Tribal Cultural Resources*

The “No Project” Alternative represents no substantial construction activities and therefore no potential for cultural and tribal cultural resources impacts.

### *Geology and Soils and Hydrology and Water Quality*

The “No Project” Alternative represents no substantial construction activities or changes to operations at the site and therefore no potential for geology and soils and hydrology and water quality impacts.

### *Hazards and Hazardous Materials*

The “No Project” Alternative represents no substantial construction activities or changes to operations at the site and therefore no potential for hazards and hazardous materials impacts.

### *Land Use and Planning*

This alternative would not meet Housing Element objectives for residential units, including affordable housing, to be constructed at this site. However, since that is the existing condition and the “No Project” Alternative would not cause a change, it would not be considered an impact under CEQA.

### *Noise*

The “No Project” Alternative represents no substantial construction activities or changes to operations at the site and therefore no potential for noise impacts.

### *Population and Housing, Public Services, and Recreation*

The “No Project” Alternative represents no substantial construction activities or changes to operations at the site and therefore no potential for population and house, public services, and recreation impacts.

### *Transportation*

The “No Project” Alternative represents no substantial changes to operations at the site and therefore no potential for transportation impacts.

### *Utilities and Service Systems, and Energy*

The “No Project” Alternative represents no substantial construction activities or changes to operations at the site and therefore no potential for utilities, service systems, and energy impacts.

### *Wildfire*

Because the Town does not currently have a mechanism to require comprehensive vegetation management without a project, it is assumed that wildfire risk at the site would not be reduced as it would be under the proposed Project. However, since that is the existing condition and the “No Project” Alternative would not cause a change, it would not be considered an impact under CEQA.

### Ability to Accomplish Project Objectives and Feasibility

The “No Project” Alternative would have the following ability to meet Project objectives:

1. The “No Project” Alternative would not meet the objective to maximize single-family housing opportunities in an area the Town has studied and identified for housing. This alternative would not result in the construction of any residential units at the site.
2. The “No Project” Alternative would not meet the objective to reduce wildfire risk at the site, increase access for fighting wildfires, and contribute to a more fire resilient community. This alternative would not result in any additional access or management of wildfire risk.
3. The “No Project” Alternative would not meet the objective to make progress toward the Town’s fair share low-income housing needs under the Housing Element of the Town’s General Plan, enable a density bonus, and comply with the Town’s inclusionary housing ordinance. This alternative would not result in the construction of any residential units at the site.
4. The “No Project” Alternative would not meet the objective to cluster development closest to existing infrastructure on relatively flat land, in a manner that avoids development on unstable soil, preserves substantial open space, minimizes grading, and fosters a sense of community. While the existing use is clustered on the flat area near infrastructure, it does not represent new development.

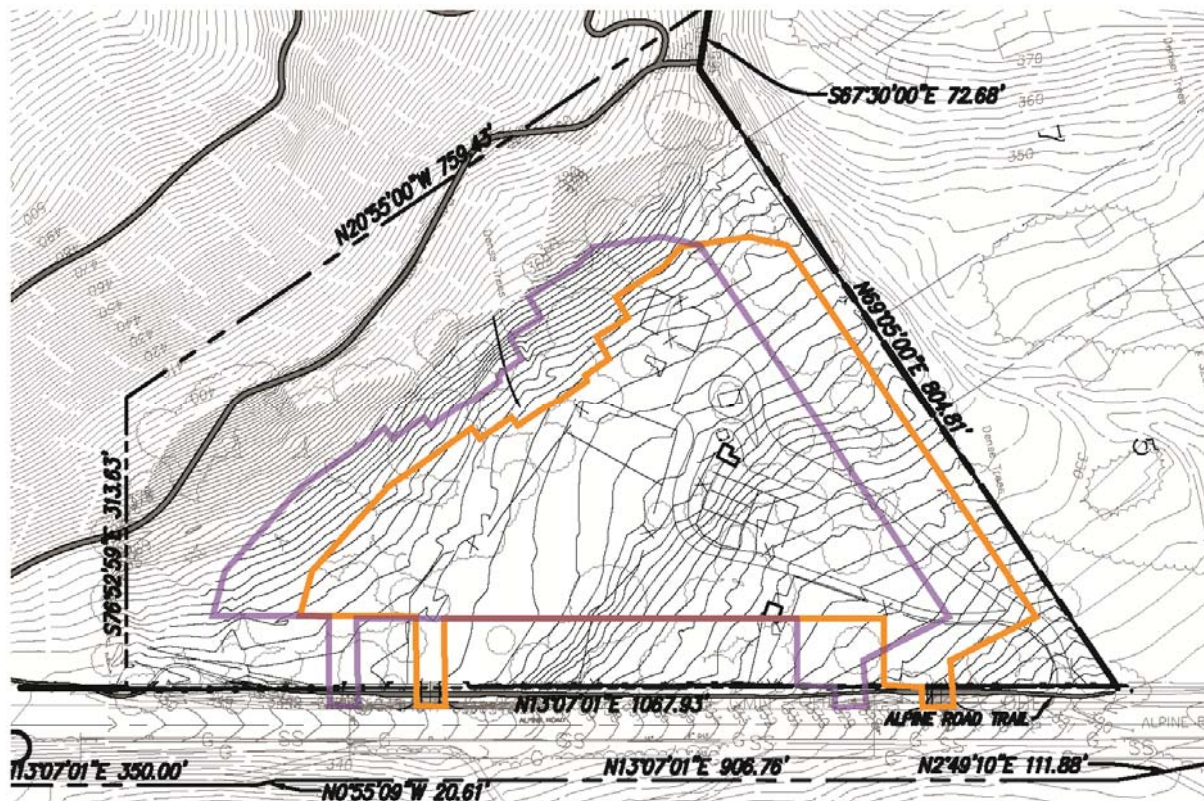
The “No Project” Alternative would not meet any of the Project Objectives.

This alternative represents the possibility that no project is approved on this site at this time. It would not preclude application for development of the site at a later point.

## **ALTERNATIVE B: “LARGER SETBACK” FROM NEARBY LOTS ALTERNATIVE**

### Alternative Description

The “Larger Setback” Alternative assumes the same development would occur but shifted farther to the south to allow for increased setback from nearby lots to the north as requested by some of the nearby neighbors. Construction activities under this alternative would be increased to account for the shifting of development to a less flat area of the lot, which would require more grading. A potential layout for this alternative is included as **Figure 20.1**, showing the relationship to the topographical map of the site. It is assumed that under this Alternative, the fire access road, trails, and VMP would remain the same as under the Project.



**Figure 20.1: “Larger Setback” Alternative Potential Layout**

Orange outline represents approximate limits of grading for the Residential Development Area under the proposed Project  
 Purple outline represents a shift of that footprint to the south such that residential lots are 100 feet from the northern property line.

Source: modified from Project plan set

### Impact Summary

Under the “Larger Setback” Alternative, impacts would remain substantially the same as they are under the Project. There would be a marginal increase in construction-related impacts due to the increased grading activities that would be required by shifting the development to a less flat portion of the site, including marginally increased air quality and greenhouse gas emissions, the potential for soil erosion and stormwater pollutions, additional tree removal, use of construction hazardous materials (like fuel and lubricants), and the need to design appropriately for the soil conditions and slope and stormwater.

This alternative was assessed in response to feedback received from neighborhood residents. As discussed by topic below, the proposed Project is marginally preferable to this alternative from an environmental perspective because the “Increased Setback” Alternative would have the same or marginally increased environmental impacts in all respects.

### *Aesthetics*

This alternative would result in more disturbance of the wooded hillside slope area than the proposed Project, but still would represent limited disturbance compared to the size of the undisturbed portion of the overall Project site. There would be no substantial changes in the impacts related to aesthetics



under the “Larger Setback” Alternative, which would remain less than significant as under the proposed Project.

#### *Agricultural, Forestry, and Mineral Resources*

There are no agricultural, forestry, or mineral resources or regulations at the Project site and therefore no potential for impact. The proposed Project and all alternatives would have no impact with respect to these topics.

#### *Air Quality and Greenhouse Gas Emissions*

Construction-period emissions (criteria air pollutants, toxic air contaminants, and greenhouse gasses) under the “Larger Setback” Alternative would be marginally more than those associated with the proposed Project during the construction period due to the need for more grading activities and require the same general mitigation measures to reduce to less than significant levels. Because this alternative proposes the same amount and size of units as the proposed Project, there would be no change in operational emissions or related impacts.

#### *Biological Resources*

Impacts to biological resources at the Project site and in the vicinity under this alternative would be identical to those associated with the proposed Project. Disturbance of the site could result in the direct loss or injury to burrowing owls if they are on site, which would be mitigated to a less than significant level through pre-construction evaluation and implementation of appropriate avoidance measures, as identified in Chapter 6: Biology.

Potential impacts to sensitive species that could be on the site occur due to development of residential lots and also vegetation management activities to address wildfire risks. The movement of the development footprint a little farther up the wooded hillside would marginally increase the currently natural area that would be permanently changed to a developed state and would result in the removal of additional trees. It is assumed the vegetation management plan would address the entire undeveloped portion of the site under the proposed Project of this alternative. Therefore, because the disturbance is site-wide to some degree under either the alternative or the proposed Project, the potential impacts to sensitive species at the site and need for identified mitigation would remain about the same despite the disturbance from the development footprint being marginally more impactful.

#### *Cultural and Tribal Cultural Resources*

As under the proposed Project, this alternative would have residential development appropriately distanced from the known prehistoric resource at the site (a stone circle lithic hearth site including surface/subsurface elements). While there are no other known cultural or tribal cultural resources at the site, due to known sites in the vicinity and the physical characteristics of the site, there is the potential to discover resources during construction activities. This alternative would disturb approximately the same size footprint as the Project (while shifted), and the impacts related to potential disturbance of unknown cultural and tribal cultural resources would be approximately the same as under the proposed Project and would be reduced through the identified mitigation.

#### *Geology and Soils and Hydrology and Water Quality*

While a similar footprint area, with the development shifted such that additional hillside grading would be required, this alternative could result in a marginally greater potential for erosion and stormwater pollution during construction, which would be mitigated through implementation of

appropriate erosion and stormwater control as under the Project and would marginally increase potential complications related to site soils, slope stability, and stormwater system design, which would be addressed through implementation of appropriate design-level geotechnical recommendations and stormwater planning as under the Project.

#### *Hazards and Hazardous Materials*

The site does not contain known contamination and construction and operation of residential units would use only relatively small quantities of common construction or household hazardous materials including construction equipment fuel and lubricants, and household cleaners, which are required to be handled according to applicable regulations. This applies to the proposed Project as well as all alternatives and there would be no substantial change in hazardous materials impacts.

#### *Land Use and Planning*

This alternative is largely the same as the proposed Project from a land use and planning perspective as the setback from neighboring uses already meets code requirements under the Project. Therefore, there would be no change in the environmental impacts related to land use and planning between this alternative and the proposed Project.

#### *Noise*

As under the proposed Project, residential operations would have noise levels consistent with surrounding uses. Because of the increased construction activities required to grade for development farther into the hillside area, the total amount of construction noise would be marginally increased in duration, however, it would be farther from the closest receptors due to the increased setback. As under the proposed Project, construction activities would comply with applicable regulations requiring construction noise control measures. Therefore, while construction noise would be somewhat different in details under this alternative, the impact to receptors would be generally the same as under the proposed Project.

#### *Population and Housing, Public Services, and Recreation*

As a site indicated for residential development in the Town's Housing Element and helping to meet the Town's Regional Housing Needs, the residential development under the proposed Project of any of the alternatives would not be considered "unplanned" and there are currently no housing units or people living at the site so no potential to cause displacement. While additional residents would create additional marginal demand for public services and recreation under the proposed Project or any of the alternatives, the site is within or adjacent to existing service areas and would not require construction of additional or expanded off-site facilities. The impacts with respect to population and house, public services, and recreation would be generally the same with this alternative as under the proposed Project.

#### *Transportation*

This alternative proposes the same number and size of residential units just shifted slightly on the site. There would be no differences between the transportation impacts of the proposed Project and this alternative.

*Utilities and Service Systems and Energy*

This alternative proposes the same number and size of residential units just shifted slightly on the site. There would be no differences between the utilities and services systems and energy impacts of the proposed Project and this alternative except for a marginal increase in energy use during construction to account for the greater grading effort.

*Wildfire*

This alternative proposes the same number and size of residential units just shifted slightly on the site and it is assumed a comprehensive vegetation management plan and fire access road would be implemented the same as under the proposed Project. There would be no differences between the wildfire impacts of the proposed Project and this alternative.

Ability to Accomplish Project Objectives and Feasibility

The “Increased Setback” Alternative would have the following ability to meet Project objectives:

1. The “Increased Setback” Alternative would meet to the same degree the objective to maximize single-family housing opportunities in an area the Town has studied and approved for housing. This alternative would result in the same total 39 residential units, including 27 single-family homes.
2. The “Increased Setback” Alternative would meet to the same degree the objective to reduce wildfire risk at the site, increase access for fighting wildfires, and contribute to a more fire resilient community. This alternative would result in the same reduced wildfire risk and slowed wildfire spread due to vegetation management, increased access, defensible space and fire hardened homes.
3. The “Increased Setback” Alternative would meet to the same degree the objective to make progress toward the Town’s fair share low-income housing needs under the Housing Element of the Town’s General Plan, enable a density bonus, and comply with the Town’s inclusionary housing ordinance. This alternative would result in the same total 12 affordable residential units.
4. The “Increased Setback” Alternative would meet to a marginally lesser degree the objective to cluster development closest to existing infrastructure on relatively flat land, in a manner that avoids development on unstable soil, preserves substantial open space and avoids significant grading, and fosters a sense of community. This alternative would have clustered development near existing infrastructure but would be located on less flat land.

The “Increased Setback” Alternative would meet all of the Project Objectives to the same or only marginally lesser degree than would the proposed Project. It is anticipated that the increased grading necessary for this alternative would not result in a financially infeasible project; however a financial feasibility assessment could be submitted to verify financial feasibility if this alternative was pursued.

**ALTERNATIVE C: “NO CLUSTERING” ALTERNATIVE**Alternative Description

The “No Clustering” Alternative assumes the site would be developed with standard single family homes each on their own lots rather than a clustered development including some multi-family homes and duet units. This would eliminate the need for a Planned Unit Development approval and more closely follow the adjacent lotting pattern. Without a Planned Unit Development, each lot would be at least 3.5 acres in size, which would total 21 lots that could be developed on the site. Per the Town’s

Inclusionary requirements codified at PVMC Section 17.20.215, 3 of the units would be deed restricted for affordable households. Further, given the larger lot sizes and new State laws promoting accessory dwelling unit (ADU) and junior accessory unit (JADU) construction, 21 detached ADUs are also assumed for this alternative, bringing the total number of units to 42.<sup>5</sup> Construction activities would be increased to account for a greater development footprint into a less flat portion of the site and the need for longer driveways to reach the larger, separate lots.

Due to the large size of the lots, this analysis assumes that much of the site would remain in a generally natural state despite being divided into private lots. No trails or fire access road would be developed and no comprehensive vegetation management plan would be implemented.

### Impact Summary

Under the “No Clustering” Alternative, impacts would remain similar to those under the Project. There would be a marginal increase in construction-related impacts due to the increased grading activities for scattered development sites and longer driveways, including marginally increased air quality and greenhouse gas emissions, the potential for soil erosion and stormwater pollutions, additional tree removal, use of construction hazardous materials (like fuel and lubricants), and the need to design appropriately for the soil conditions and slope and stormwater. Additionally, while the proposed Project would avoid disturbance to a known cultural resource on the non-development portion of the site, because this alternative would divide the whole site into private lots, there would be a significant potential to impact the resource and the need to formally protect it as well as marginally increased potential to discover other unknown resources due to development of a larger area of the site.

Because a larger lot development would support addition of ADUs and JADUs, up to 42 units are assumed under this alternative, which would be three more units than under the proposed Project and would result in marginal increases in use of utilities, energy, and an increase in transportation impacts (vehicle miles traveled per capita).

The division of the site into private lots would likely preclude the implementation of a comprehensive vegetation management plan to address wildfire risk. Individual lot owners would be motivated to address wildfire risks on their own lots, but the beneficial effects may not be as successful without a coordinated and comprehensive plan. Therefore, wildfire impacts under this alternative would likely be marginally increased compared to the proposed Project.

This alternative was included to explore the difference in environmental impacts if the Project were held to all development standards for single family detached homes under the existing zoning. While the need for a Conditional Use Permit for a Planned Unit Development would not be required under this alternative, such an approval process is specifically allowed and clustering was specifically encouraged at this site in the General Plan to minimize the development of the wooded hillside, there is no associated environmental impact related to the need for a Planned Unit Development.

As discussed by topic below, the proposed Project is preferable to this alternative from an environmental perspective because the “No Clustering” Alternative would have the same or marginally increased environmental impacts in all respects and potentially substantially increased impacts with respect to cultural resources.

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<sup>5</sup> This would average to one additional ADU or JADU per lot. While more than that would be allowed, the exact number is speculative and this is a reasonable average for consideration of this alternative.

### *Aesthetics*

This alternative would result in disturbance across more of the site and the need for more tree removal for longer driveways and grading of home footprints throughout the site in an area considered part of the Alpine Road Scenic Corridor. However, the rural-residential nature of the large lot development under this alternative may allow for greater screening of homes and is likely to be found consistent with the objectives of the scenic corridor and residential development identified for such development would not be considered a negative change in visual character. It can be assumed that any development of the site would meet Town requirements and guidelines regarding low-impact lighting. Aesthetics impacts for this alternative would therefore remain less than significant as under the proposed Project.

### *Agricultural, Forestry, and Mineral Resources*

There are no agricultural, forestry, or mineral resources or regulations at the Project site and therefore no potential for impact. The proposed Project and all alternatives would have no impact with respect to these topics.

### *Air Quality and Greenhouse Gas Emissions*

Construction-period emissions (criteria air pollutants, toxic air contaminants, and greenhouse gasses) under the “No Clustering” Alternative would be marginally more than those associated with the proposed Project during the construction period due to the need for more grading and driveway paving and require the same general mitigation measures to reduce to less than significant levels.

While this alternative would include fewer homes on separate lots (21), because of the large lots under this alternative, each lot could include ADUs/JADUs, with an assumed total unit count up to 42. Since 42 is three more units than proposed under the Project, this alternative has the potential to result in slightly higher operational emissions, though the operational emissions would still be below applicable screening levels and less than significant without mitigation required.

### *Biological Resources*

Potential impacts to sensitive species that could be on the site occur due to development of residential lots and also vegetation management activities to address wildfire risks. While dividing the site into private lots under this alternative would preclude a comprehensive vegetation management plan, individual lot owners would be motivated to address wildfire risks on their own lots while still being constrained to avoid disturbance to riparian habitats. The potentially reduced disturbance from vegetation management would be somewhat offset by greater disturbance from potentially more grading and longer driveways to allow for the non-clustered development throughout the site. Therefore, because the disturbance is site-wide to some degree under either the alternative or the proposed Project, the potential impacts to sensitive species at the site and need for identified mitigation would remain about the same despite the character of that disturbance being different.

### *Cultural and Tribal Cultural Resources*

There is a known prehistoric resource at the site (a stone circle lithic hearth site including surface/subsurface elements). The proposed Project avoids disturbance by distancing residential development and public trails away from the resource. However, with division of the site into private lots under this alternative, the potential to impact this prehistoric site would be greater and likely require formal protections to be put into place assuming removal (which would be a significant and unavoidable impact) can be avoided.

While there are no other known cultural or tribal cultural resources at the site, due to known sites in the vicinity and the physical characteristics of the site, there is the potential to discover resources during construction activities. With the more of the site area to be disturbed under this alternative, the potential to disturb unknown resources would be marginally greater than under the proposed Project and would be reduced through the identified mitigation.

#### *Geology and Soils and Hydrology and Water Quality*

This alternative could result in disturbance of more of the site than under the Project related to grading for more spread out development sites and driveways. This would result in a marginally greater potential for erosion and stormwater pollution during construction, which would be mitigated through implementation of appropriate erosion and stormwater control as under the Project. While development throughout the hilly portion of the site could result in increased complications related to site soils, slope stability, and stormwater system design, these would be addressed through implementation of appropriate design-level geotechnical recommendations and stormwater planning as under the Project.

#### *Land Use and Planning*

The “No Clustering” Alternative would be fully consistent with development standards in the underlying zoning and a Conditional Use Permit for a Planned Unit Development would not be required. However, because such an approval process is specifically allowed and clustering was specifically encouraged at this site in the General Plan to minimize the development of the wooded hillside, there is no associated environmental impact related to the need for a Planned Unit Development and therefore no change in the environmental impacts related to land use and planning between this alternative and the proposed Project. This alternative would not meet all principals of the General Plan related to minimizing development on slopes (2105.3 through 2105.9).

#### *Noise*

As under the proposed Project, residential operations would have noise levels consistent with surrounding uses. Because of the increased construction activities for scattered development site grading and driveways, total construction noise would increase but would not be clustered near any one group of receptors. Additionally, as under the proposed Project, construction activities would comply with applicable regulations requiring construction noise control measures. Therefore, while construction noise would be somewhat different in details under this alternative, the impact to receptors would be generally the same as under the proposed Project.

#### *Population and Housing, Public Services, and Recreation*

As a site indicated for residential development in the Town’s Housing Element and helping to meet the Town’s Regional Housing Needs, the residential development under the proposed Project of any of the alternatives would not be considered “unplanned” and there are currently no housing units or people living at the site so no potential to cause displacement. While additional residents would create additional marginal demand for public services and recreation under the proposed Project or any of the alternatives, the site is within or adjacent to existing service areas and would not require construction of additional or expanded off-site facilities. The impacts with respect to population and housing, public services, and recreation would be generally the same with this alternative as under the proposed Project.

### *Transportation*

The proposed Project would generate a less than significant impact with respect to vehicle miles traveled due largely to the short commute trips for Stanford faculty (required at least one in each single-family home). Even assuming that each lot would also contain an ADU not restricted to Stanford faculty, the VMT would remain below significance threshold levels under this alternative. (This alternative would have a daily VMT per capita of 21.78 compared to a threshold of 21.83 and a proposed Project VMT of 20.57.) As under the proposed Project, this alternative would be required to design circulation meeting applicable safety and emergency access requirements and would not otherwise conflict with transportation plans or otherwise cause impacts above those identified for the proposed Project.

### *Utilities and Service Systems and Energy*

Residential development at the site would increase demand for utilities and use of service systems and energy. Because this alternative would require additional construction activities and with the ADU would result in more residential units than under the proposed Project, this alternative would result in marginally greater demand for and use of utilities and energy. However, due to the relatively small size of the project and availability of existing utilities and service providers, while marginally increased as compared to the proposed Project, the impacts of this alternative with respect to these topics would remain less than significant.

### *Wildfire*

The proposed Project would result in a reduction of wildfire risks at the site largely due to implementation of a comprehensive vegetation management plan throughout the undeveloped portion of the site and addition of a fire access road. Additional and longer driveways would likely provide additional fire access to the site similar to the formal fire access road of the proposed Project. While dividing the site into private lots under this alternative would likely preclude a comprehensive vegetation management plan, individual lot owners would be motivated to address wildfire risks on their own lots, but the beneficial effects may not be as successful without a coordinated and comprehensive plan. Therefore, wildfire impacts under this alternative would likely be marginally increased compared to the proposed Project.

### Ability to Accomplish Project Objectives and Feasibility

The “No Clustering” Alternative would have the following ability to meet the Project objectives:

1. The “No Clustering” Alternative would meet to a lesser degree the objective to maximize single-family housing opportunities in an area the Town has studied and approved for housing. This alternative would result in 21 single-family homes compared to 27 single-family homes under the proposed Project.
2. The “No Clustering” Alternative would meet to a lesser degree the objective to reduce wildfire risk at the site, increase access for fighting wildfires, and contribute to a more fire resilient community. With no comprehensive vegetation management plan across a site divided into private lots, the beneficial effects of vegetation management would likely not be as successful and wildfire risk and speed of spread would be as reduced as under the proposed Project.
3. The “No Clustering” Alternative would meet to a lesser degree the objective to make progress toward the Town’s fair share low-income housing needs under the Housing Element of the Town’s General Plan, enable a density bonus, and comply with the Town’s inclusionary housing ordinance. This alternative would be required by the inclusionary housing ordinance to provide at least 3 of the single-family homes at an affordable level, compared to 12 affordable units under

the proposed Project. Meeting Town requirements would not trigger a density bonus. While new State laws and the large lot size would allow for an additional ADU on each lot, there would not necessarily be restrictions on affordability for these additional ADUs.

4. The “No Clustering” Alternative would not meet the objective to cluster development closest to existing infrastructure on relatively flat land, in a manner that preserves substantial open space and steep slopes, and fosters a sense of community. The proposed Project clusters development such that 90% of the site – about 68 acres - would be preserved as open space. This alternative would not include clustering at all but would instead divide the entire site into large private lots without preserving any substantial land as open space outside of private lots.

The “No Clustering” Alternative would not meet the Project Objective to cluster development and preserve open space and would only meet the other three objectives to a lesser degree than would the proposed Project. It is anticipated that access and grading challenges could be overcome in a financially feasible way; however a financial feasibility assessment could be submitted to verify financial feasibility if this alternative was pursued.

## SUMMARY OF EVALUATION OF ALTERNATIVES

In addition to the discussion and comparison of impacts of the proposed Project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an “environmentally superior” alternative be selected and the reasons for such a selection disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of the Town.

**Table 20.1**, on the following pages, provides a summary comparison of the environmental impacts of the alternatives compared to the proposed Project. The table lists the level of significance of the impacts of the proposed Project to each of the environmental topics areas analyzed in the EIR and shows whether the impacts anticipated under each proposed alternative would be similar to (“s”), greater (“+”), marginally greater (“s+”), lesser (“-”), or marginally lesser (“s-”) than the proposed Project.

No significant and unavoidable impacts were identified under the proposed Project. All Project impacts are either less than significant or can be reduced to those levels through implementation of the mitigation contained in this Draft EIR. Because of the low impact of the proposed Project, differences between it and the Alternatives are confined to marginal increases or reductions in already less than significant impacts except in the case of the “No Project” Alternative, which avoids all impacts entirely, and the potential for construction-period impacts to cultural resources, which could be significantly increased under the “No Clustering” Alternative.

The “No Project” Alternative would not result in any substantial changes to the site or use and therefore, has the lowest possible impacts in every parameter. The “No Project” Alternative would be the environmentally superior alternative. However, the “No Project” Alternative does not meet any of the Project objectives.

The CEQA Guidelines also require that “if the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives” (CEQA Guidelines Section 15126.6(e)(2)). In general, the environmentally superior alternative minimizes adverse impacts to the environment, while still achieving the basic project objectives.



Because the “No Clustering” Alternative would require additional construction activities to prepare spread out development sites and longer driveways, it would result in a marginally greater construction impacts including the potential to significantly impact a known cultural resource at the site and is therefore not environmentally superior to the Project.

The “Larger Setback” Alternative and the Project would have similar impacts. The “Larger Setback” alternative would result in marginally greater impacts related to grading, including construction emissions and tree removals. Therefore, the Project is the next most environmentally superior alternative.

**TABLE 20.1. SUMMARY COMPARISON OF IMPACTS, PROPOSED PROJECT AND ALTERNATIVES**

ENVIRONMENTAL ISSUE AREA	Proposed Project	“No Project” Alternative	“Larger Setback” Alternative	“No Clustering” Alternative
<b>AESTHETICS</b>				
<i>Would the project have a substantial adverse effect on a scenic vista?</i>	LTS	-	s	s
<i>Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?</i>	LTS	-	s	s
<i>Would the project substantially degrade of the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?</i>	LTS	-	s	s
<i>Would the project create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?</i>	LTS	-	s	s
<b>AGRICULTURAL, FOREST, AND MINERAL RESOURCES</b>				
<i>Would the project result in conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use; a conflict with existing zoning for agricultural use, or a Williamson Act contract; a conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)); the loss of forest land or conversion of forest land to non-forest land; or changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.?</i>	No Impact	s	s	s
<i>Would the project result in loss of availability of a known mineral resource that would be of future value to the region and the residents of the state; or loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?</i>	No Impact	s	s	s
<b>AIR QUALITY</b>				
<i>Would the project conflict with or obstruct implementation of the applicable air quality plan?</i>	No Impact	s	s	s

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<b>ENVIRONMENTAL ISSUE AREA</b>	<b>Proposed Project</b>	<b>“No Project” Alternative</b>	<b>“Larger Setback” Alternative</b>	<b>“No Clustering” Alternative</b>
<i>Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?</i>	<b>LTS (w/MM)</b>	-	s+	s+
<i>Would the project expose sensitive receptors to substantial pollutants?</i>	<b>LTS</b>	-	s+	s+
<i>Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?</i>	<b>No Impact</b>	s	s	s
<b>BIOLOGICAL RESOURCES</b>				
<i>Would the project have a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Services?</i>	<b>LTS (w/MM)</b>	-	s	s
<i>Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game, or the US Fish and Wildlife Service?</i>	<b>LTS (w/MM)</b>	-	s	s
<i>Would the project have a substantial adverse effect on state or federally protected wetlands (including but not limited to, marsh, vernal pool, coastal etc.), through direct removal, filling, hydrological interruption, or other means?</i>	<b>LTS</b>	-	s	s
<i>Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?</i>	<b>LTS</b>	-	s	s
<i>Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</i>	<b>LTS</b>	-	s	s
<i>Would the project conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?</i>	<b>No Impact</b>	s	s	s
<b>CULTURAL AND TRIBAL CULTURAL RESOURCES</b>				
<i>Would the project cause a substantial adverse change in the significance of a historical or archaeological resource pursuant to CEQA Guidelines Section 15064.5; or disturb any human remains, including those interred outside of formal cemeteries.</i>	<b>LTS (w/MM)</b>	-	s	+
<i>Would the project cause a substantial adverse change in the significance of a tribal</i>	<b>LTS (w/MM)</b>	-	s	+

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ENVIRONMENTAL ISSUE AREA	Proposed Project	“No Project” Alternative	“Larger Setback” Alternative	“No Clustering” Alternative
<i>cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe?</i>				
<b>GEOLOGY AND SOILS</b>				
<i>Would the project directly or indirectly cause substantial adverse effects, including the risk of loss, injury or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure including liquefaction, or landslides?</i>	<b>LTS (w/MM)</b>	-	s	s
<i>Would the project result in soil erosion or the loss of topsoil?</i>	<b>LTS (w/MM)</b>	-	s+	s+
<i>Would the project be located on a geologic unit or soil that is unstable (or would become unstable as a result of the project) and could potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?</i>	<b>LTS (w/MM)</b>	-	s+	s+
<i>Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?</i>	<b>LTS (w/MM)</b>	-	s	s
<i>Would the project have soils incapable of adequately supporting the use of septic tanks or alternate waste water disposal systems where sewers are not available for the disposal of waste water?</i>	<b>No Impact</b>	s	s	s
<b>GREENHOUSE GAS EMISSIONS</b>				
<i>Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</i>	<b>LTS</b>	-	s+	s+
<i>Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?</i>	<b>No Impact</b>	s	s	s
<b>HAZARDS AND HAZARDOUS MATERIALS</b>				
<i>Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</i>	<b>LTS</b>	-	s+	s+
<i>Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</i>	<b>LTS</b>	-	s+	s+
<i>Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?</i>	<b>No Impact</b>	s	s	s

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<i>Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?</i>	<b>No Impact</b>	s	s	s
<i>For a project located within an airport land use plan area, would it result in a safety hazard or excessive noise for people residing or working in the project area?</i>	<b>No Impact</b>	s	s	s
<i>Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</i>	<b>No Impact</b>	s	s	s
<b>HYDROLOGY AND WATER QUALITY</b>				
<i>Would the project violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?</i>	<b>LTS (w/MM)</b>	-	s+	s+
<i>Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?</i>	<b>No Impact</b>	s	s	s
<i>Would the project alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner, which would result in substantial erosion or siltation on- or off-site?</i>	<b>LTS (w/MM)</b>	-	s+	s+
<i>Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, or substantially increase the rate or amount of surface runoff in a manner which would impede or redirect flood flows, result in flooding on- or off-site or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?</i>	<b>LTS (w/MM)</b>	-	s+	s+
<i>In a flood hazard, tsunami or seiche zone, risk release of pollutants due to project inundation?</i>	<b>No Impact</b>	s	s	s
<i>Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?</i>	<b>No Impact</b>	s	s	s
<b>LAND USE</b>				
<i>Would the project result in the physical division of an established community?</i>	<b>No Impact</b>	s	s	s
<i>Would the project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or</i>	<b>LTS</b>	-	s	s

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<i>mitigating an environmental effect?</i>				
<b>NOISE</b>				
<i>Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</i>	LTS	-	s	s
<i>Would the project result in generation of excessive groundborne vibration or groundborne noise levels?</i>	LTS	-	s	s
<i>For a project within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport, would the project expose people residing or working in the project area to excessive noise levels?</i>	LTS	-	s	s
<b>POPULATION AND HOUSING, PUBLIC SERVICES, AND RECREATION</b>				
<i>Would the project induce substantial unplanned population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?</i>	LTS	-	s	s
<i>Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?</i>	No Impact	s	s	s
<i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services, fire protection, police protection, schools, parks, other public facilities?</i>	LTS	-	s	s
<i>Would the project result in increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?</i>	LTS	-	s	s
<b>TRANSPORTATION AND CIRCULATION</b>				
<i>Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?</i>	LTS	-	s	s+

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<i>Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 [specifying criteria for analyzing transportation impacts]?</i>	<b>LTS</b>	-	s	s+
<i>Would the project substantially increase hazards due to a geometric design feature or incompatible uses?</i>	<b>LTS</b>	-	s	s
<i>Result in inadequate emergency access?</i>	<b>LTS</b>	-	s	s
<b>UTILITIES AND SERVICE SYSTEMS AND ENERGY</b>				
<i>Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?</i>	<b>LTS</b>	-	s	s+
<i>Would the project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?</i>	<b>LTS</b>	-	s	s+
<i>Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?</i>	<b>LTS</b>	-	s	s+
<i>Would the project generate solid waste in excess of State or local standards, or in excess of capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?</i>	<b>LTS</b>	-	s	s+
<i>Would the project conflict with federal, state, and local management and reduction statutes and regulations related to solid waste?</i>	<b>LTS</b>	-	s	s+
<i>Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation or conflict with or obstruct state or local plan for renewable energy or energy efficiency?</i>	<b>LTS</b>	-	s	s+
<b>WILDFIRE</b>				
<i>Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?</i>	<b>LTS</b>	-	s	s+
<i>Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?</i>	<b>LTS (wMM)</b>	-	s	s+

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<i>Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?</i>	<b>LTS (w/MM)</b>	-	s	s
<i>Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?</i>	<b>LTS</b>	-	s	s

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